

EXHIBIT B

PORTIONS OF DEPOSITION TRANSCRIPT

DEPOSITION OF MIKE BYRD

CONDUCTED JUNE 9, 2015

MICHAEL BYRD
SLEDGE VS. WATTS, III

June 09, 2015

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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

MARY PHILLIPA SLEDGE, et al, *
*
Plaintiff, *
* Civil Action No.
VS. *
* 13-2578-STA
*
CLEAL WATTS, III, et al, *
*
Defendant. *

VIDEO DEPOSITION OF MICHAEL BYRD

ANSWERS AND DEPOSITION OF MICHAEL BYRD, produced as
a witness at the instance of the Plaintiff, taken in the
above-styled and -numbered cause on the 9th day of June,
2015, A.D., beginning at 9:35 a.m., before Rachel J.
Payne, a Certified Shorthand Reporter in and for the
State of Texas, in the offices of Esquire Deposition
Solutions, located at 1700 Pacific Avenue, Suite 1000,
Dallas, Texas, in accordance with the Rules of Civil
Procedure and the agreement hereinafter set forth.



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A P P E A R A N C E S

FOR THE PLAINTIFF:

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Mr. Anthony Pietrangelo
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ALSO PRESENT:

CODY MODRO - Videographer
MARY PHILLIPA SLEDGE - Plaintiff

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1 THE VIDEOGRAPHER: This is the videotaped
2 deposition of Mike Byrd held in Dallas, Texas. The time
3 is now 9:35 a.m. on June 9, 2015. At this time, we are
4 now on record.

5 At this time, will the counsel please
6 introduce themselves and whom they represent, and the
7 witness will then be sworn in.

8 MR. PHILLIPS: My name is Darrell
9 Phillips. I will be taking this deposition on behalf of
10 the plaintiff, Phillipa Sledge, or one of the
11 plaintiffs. My colleague, Anthony Pietrangelo, is also
12 in the room. And the witness is named Mike Byrd, who is
13 here pursuant to subpoena without counsel.

14 THE WITNESS: Correct.

15 MICHAEL BYRD,
16 having been first duly cautioned and sworn to testify
17 the truth, the whole truth and nothing but the truth,
18 testified on his oath as follows:

19 EXAMINATION

20 BY MR. PHILLIPS:

21 Q. Good morning, Mr. Byrd.

22 A. Good morning.

23 Q. I recognize this may be inconvenient for you.
24 I appreciate you being here even though it's pursuant to
25 subpoena, but we will try to be as efficient as

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1 Q. And what is your current's wife?

2 A. Canda, C-A-N-D-A.

3 Q. Yeah.

4 A. Byrd.

5 Q. Byrd. Okay. How long have you been married
6 to Mrs. Byrd?

7 A. Two and a half years. Well, it'll be three
8 years next month, so...

9 Q. Okay. And just briefly before we move too far
10 afield, what does Mrs. Byrd do for a living?

11 A. Occupational therapy assistant.

12 Q. Okay. Do you work together?

13 A. No.

14 Q. Okay. And this may seem irrelevant. Do you
15 know what her annual gross income is?

16 A. Approximately \$80,000.

17 Q. Okay. Okay. Thank you. So you've been
18 involved in two prior divorces and there were no
19 depositions in those divorces, correct?

20 A. Correct.

21 Q. Okay. Have you ever been charged with a
22 crime?

23 A. No.

24 Q. Have you ever filed for bankruptcy protection?

25 A. No.



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1 A. No.

2 Q. You don't own that property?

3 A. No.

4 Q. So it's a rental?

5 A. Yes.

6 Q. Okay. Do you own any property?

7 A. I own a residential lot in my hometown of
8 Kerens, Texas, K-E-R-E-N-S. I don't own it. It's my
9 father's. He's passed away. I'm the executor of his
10 will. I'm managing it until we --

11 Q. Is there anything on that lot?

12 A. No.

13 Q. Okay. You plan to develop that lot?

14 A. No.

15 Q. So it's just an empty lot?

16 A. Correct.

17 Q. It's zoned residential?

18 A. Correct.

19 Q. Okay. And how old are you?

20 A. 57.

21 Q. 57. Okay. You said you worked for RehabCare.
22 And you work full-time?

23 A. No.

24 Q. What do -- what is your schedule like
25 typically?

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1 A. I work what's referred to as PRN, as needed.
2 They call me when they need me.

3 Q. What does a typical week look like for you?

4 A. It varies. It could be no days a week. It
5 could be every day -- every day.

6 Q. Seven?

7 A. Seven -- well, five, usually not weekends.

8 Q. How many days did you work last week?

9 A. Three.

10 Q. Okay. And do you -- do you remember what your
11 gross income was last year?

12 A. Gross, I don't. I'd just be speculating. I'd
13 say maybe 20,000.

14 Q. Okay. And other than -- other than your work
15 as a physical therapy assistant, do you have any other
16 sources of income?

17 A. No.

18 Q. Okay. Did you have any other sources of
19 income last year?

20 A. Same.

21 Q. Same.

22 A. For the last three years, same -- same income.

23 Q. It's just this PRN physical therapy
24 assistant's work?

25 A. Correct.

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1 Q. What is Byrd's Eye Enterprises?

2 A. That's the S corporation, consulting fitness,
3 exercise, nutrition.

4 Q. And do you have any -- I assume you are a --
5 you founded that entity?

6 A. Correct.

7 Q. Are there any other -- any other officers?

8 A. No.

9 Q. Any other directors?

10 A. No.

11 Q. Any other employees?

12 A. No.

13 Q. So it's just you?

14 A. Correct.

15 Q. And are you currently active with the State of
16 Texas?

17 A. Yes.

18 Q. Okay. And do you generate any -- any revenue
19 from Byrd's Eye Enterprises?

20 A. It kind of goes back and forth, sometimes a
21 loss, sometimes a gain. Annual, I think maybe \$3,000.

22 Q. Okay. And so you have clients -- you have
23 consultancy clients?

24 A. They come and go. I don't have consistent
25 clients at this time.

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1 Q. What -- without asking you to identify who
2 they are, because I don't know that it's necessarily
3 relevant, what kind of a client would you have as a
4 consultant for Byrd's Eye Enterprises?

5 A. Anyone who is interested in a personal fitness
6 program --

7 Q. So is it an individual --

8 A. -- health, nutrition. Individually, yes.

9 Q. So that sounds a bit like you might be a
10 personal trainer?

11 A. Something more than that. My credentials are
12 a little bit beyond a personal trainer, but, yes, very
13 similar to a personal trainer.

14 Q. Okay. I'm going to ask you about that in just
15 a second. And in the -- in the context of your -- your
16 fitness consulting enterprise, Byrd's Eye Enterprises,
17 have you provided any of these fitness consulting
18 services to any member of the Watts family?

19 A. No.

20 Q. Okay. When did you form Byrd's Eye
21 Enterprises?

22 A. 1997.

23 Q. So has it always been used for the same
24 purpose?

25 A. Correct.

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1 Q. Have you talked to Mr. Watts about the
2 lawsuit?

3 A. No.

4 Q. And when was the last time you spoke with
5 Mr. Watts?

6 A. Probably -- yesterday.

7 Q. Yesterday. What was the substance of that
8 conversation?

9 A. Well, as you know, I have invested with
10 Mr. Watts and having to do with a shipment -- delays in
11 the shipment.

12 Q. So you spoke with him yesterday about your
13 investment?

14 A. Correct.

15 Q. Did you discuss with him your intended
16 appearance here for the deposition?

17 A. No.

18 Q. Have you ever discussed with him your subpoena
19 or your appearance for the deposition?

20 A. Yes.

21 Q. And what -- when was that?

22 A. Several times over the last few weeks since I
23 received the subpoena.

24 Q. And what has -- if -- I had asked you to
25 generalize them. Now I'm going to ask you to be more

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1 A. Well, you know, I don't know. I haven't seen
2 his medical degree, but he's discussed with me his
3 medical education and so I trust him.

4 Q. Okay. Have you ever known him -- since you've
5 known him since college, have you ever known him to
6 practice medicine?

7 A. No.

8 Q. Okay. Have you ever notice -- known him to
9 write prescriptions?

10 A. No.

11 Q. Okay. How frequently would you say you speak
12 with him?

13 A. I'd say it's safe to say daily.

14 Q. Daily?

15 A. Pretty much.

16 Q. Is he your best friend?

17 A. No.

18 Q. Okay. Is he --

19 A. My wife is my best friend, but he's a -- he's
20 a close friend.

21 Q. Is he one of your best friends?

22 A. I suppose so.

23 Q. Was he a groomsman at your wedding?

24 A. Yes.

25 Q. Okay. Was he a groomsman at your first

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1 wedding?

2 A. Yes.

3 Q. And your second wedding?

4 A. Yes.

5 Q. And your third wedding?

6 A. No.

7 Q. Okay. Other than the investments that we're
8 going to talk about in a second, have you ever given him
9 money for any reason?

10 A. No.

11 Q. Okay. Has he ever given you money for any
12 reason?

13 A. No.

14 Q. Okay. So I'm going to ask you this question,
15 knowing the answer, but I think it'll get us started.

16 Have you invested with Cleal Watts?

17 A. Yes.

18 Q. Okay. And when was that?

19 A. I think it's about a year ago --

20 Q. Okay.

21 A. -- about a year.

22 Q. Would it have been around July of 2014?

23 A. Possibly.

24 Q. And how did that come up?

25 A. I -- I was -- I guess I was discussing with

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1 investors?

2 A. Yes.

3 Q. When did he tell you that?

4 A. Just in the course of discussing my gold, you
5 know, the gold -- the investment that I made and the way
6 that he conducted the business, that there were multiple
7 investors. That's about it.

8 Q. And did he ask you for a specific amount?

9 A. No.

10 Q. And did he make you any promises about a
11 return on investment?

12 A. No.

13 Q. Did he suggest any --

14 A. He suggested there would be returns, yes. He
15 didn't give me an exact amount. He said 20 percent,
16 basically, I think is the number that he has continued
17 to suggest.

18 Q. He's continued as recently as when?

19 A. It's never been anything other than that.

20 Q. Okay.

21 A. I expect the -- you know, I'm not being
22 irrational, but I know things can fluctuate, but I'm
23 expecting approximately a 20 percent return.

24 Q. Okay. How much did you invest with him last
25 year?

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1 A. Well, 250,000, plus I've also added to that
2 some money for expenses with shipment delays and whatnot
3 over the past several months. And I haven't kept track
4 of the total on that, but --

5 Q. Do you have a ballpark sense of what that
6 might be?

7 A. I'm going to guess maybe \$20- to \$30,000.

8 Q. Okay. And tell me a little bit about the
9 shipment delays. I know you've provided some documents.
10 I'm going to ask you about them later. But how would
11 these conversations about delays come up? Would you
12 call him and say, Where's the gold, or would he call you
13 and say, Hey, I have some bad news?

14 A. Either way. That's, I guess, the purpose of
15 our conversations on a regular basis, is, How are things
16 going.

17 Q. And what are some of the shipment delays?

18 A. Expenses with taxes or bonds or, you know,
19 some type of related expenses, delays in transportation,
20 delays due to medical issues.

21 Q. Whose medical issues?

22 A. Well, Ebola in west Africa.

23 Q. Right.

24 A. And the gentleman that he has in west Africa
25 working with him apparently has some medical issues.

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1 Q. Has he ever indicated that he needed legal
2 assistance in Ghana?

3 A. No.

4 Q. Did he ever tell you that he's ever been to
5 Ghana?

6 A. No.

7 Q. Okay. Do you know if he's ever been to west
8 Africa?

9 A. I do not know. He's -- he's told me that he
10 has been to west Africa.

11 Q. Okay. Before we get too far afield, where did
12 you get the money to invest with him?

13 A. Business, my business.

14 Q. Which business?

15 A. Byrd's Eye Enterprises.

16 Q. The Byrd's Eye Enterprises that you said
17 generates \$3,000 a year?

18 A. Yeah.

19 Q. You've collected \$250,000 in that?

20 A. Through prior investments, yeah.

21 Q. So Byrd's Eye also made investments?

22 A. Right.

23 Q. Okay. Well, tell me about that a little bit.

24 A. I took money from -- that I had in savings and
25 moved it into the business and invested.

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1 Q. What did you invest in?

2 A. I invested in an organization called Front
3 Sight in Nevada alone, which I earned interest on,
4 and -- and then once that matured, then I reinvested it
5 with Dr. Watts.

6 Q. Is Front Sight affiliated with Watts in any
7 way, to your knowledge?

8 A. No.

9 Q. Okay. Has -- has -- I'm going to refer to him
10 as Mr. Watts for the purposes of this deposition.

11 A. Okay.

12 Q. Has he given you any money to date?

13 A. No.

14 Q. Have you ever seen any gold --

15 A. Yes.

16 Q. -- from him?

17 A. He -- yes. He took me to the airport with him
18 and picked up some gold.

19 Q. In what form?

20 A. It looked like -- it wasn't dust, but it
21 wasn't brick or anything. It was unrefined or, to some
22 degree, unrefined gold.

23 Q. When was this?

24 A. Maybe a month ago.

25 Q. Okay. And was that your gold?



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1 A. No.

2 Q. Whose gold was that?

3 A. I have no idea.

4 Q. Do you have any idea what's become of that
5 gold?

6 A. No.

7 Q. Did he ever tell you that he was going to
8 refine it in Dallas?

9 A. Yes.

10 Q. Did he tell you where he was going to refine
11 it?

12 A. No.

13 Q. Have you ever heard of Millennium Refinery?

14 A. No.

15 Q. Okay. Have you spoken with anybody else about
16 this -- about Mr. Watts?

17 A. My wife.

18 Q. Have you been contacted by the FBI?

19 A. No.

20 Q. Has Mr. Watts told you that the FBI has been
21 contacting people?

22 A. No.

23 Q. So you have no knowledge of whether or not
24 that's true?

25 A. Correct.



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1 A. As far as I know. He and I haven't kept up
2 over the years, you know. It's just been sporadic,
3 so -- but I know Debbie -- he and Debbie have been in
4 some type of relationship for -- since 1995.

5 Q. Okay.

6 A. Don't know the nature of it.

7 Q. Have you ever talked to Mr. Watts about gold
8 at his house?

9 A. No.

10 Q. Have you ever talked about it within earshot
11 of Debbie?

12 A. Not to my knowledge.

13 Q. So most of your conversations with him
14 happened over the phone?

15 A. Over the phone or, you know, we've had lunch
16 several times.

17 Q. And where do you usually get together for
18 lunch?

19 A. It varies.

20 Q. When you sent him additional funds over these
21 last few months, how did you get them to him?

22 A. I -- I'd just withdraw it from the bank and
23 hand it to him.

24 Q. So you gave him cash?

25 A. Right.



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1 Q. Okay. Where do you bank?

2 A. Chase.

3 Q. Chase. And does Byrd's Eye bank at Chase as
4 well?

5 A. Yes.

6 Q. Do you have accounts with any other financial
7 institutions?

8 A. Wells Fargo and Sea West Coast Guard Federal
9 Credit Union.

10 Q. And are those in your name or Byrd's Eye?

11 A. My name.

12 Q. Okay. Does Byrd's Eye have an account?

13 A. No. Byrd's Eye has an account at Chase.

14 Q. Okay.

15 A. Oh, well, my -- also, the account at Wells
16 Fargo is a self-directed 401(k), so that's in Byrd's Eye
17 Enterprises.

18 Q. Okay. And it's a self-directed 401(k). And
19 the -- the Byrd's Eye account at Chase, is there
20 anything in it?

21 A. Yes.

22 Q. Approximately how much?

23 A. \$7- or \$8,000.

24 Q. Okay. Would you say that your combined
25 household income with your current wife is \$110,000 a



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1 Q. Kamora?

2 A. No.

3 Q. Okay. What do you know about Indico System
4 Resources?

5 A. Nothing, other than he tells me the gold and I
6 think -- I mean, I'm just speculating, so really that's
7 about it. I don't really know anything about it.

8 Q. Have you ever heard of Secured Asset
9 Management or SAME?

10 A. Yeah. That was named in the subpoena, I
11 believe, but that's -- I don't know anything about it.

12 Q. Okay. Do you know what -- what -- do you have
13 an opinion about -- or any personal knowledge about what
14 Mr. Watts does for income?

15 A. No.

16 Q. When he asked you to invest with him in the
17 gold, did he ever discuss any sort of fee he would take
18 as a result of executing that investment?

19 A. No.

20 Q. Okay. And was there any -- any doubt between
21 you two that it was, in fact, an investment as opposed
22 to some kind of down payment or a loan?

23 A. No.

24 Q. It's an investment, pure and simple?

25 A. Right.



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1 A. So I had some reservations, but having
2 known -- known him for a while, I -- I didn't feel
3 overly hesitant.

4 Q. So you didn't conduct what you would call any
5 kind of due diligence about the investment or about him
6 or about the people with whom he would be dealing?

7 A. No -- well, no.

8 Q. So it was -- a decision was based largely on
9 your relationship with him and your faith in him?

10 A. Correct.

11 Q. Okay. Do you have any reason today to doubt
12 that the investment is a valid investment?

13 A. No.

14 Q. Okay.

15 MR. PHILLIPS: Let's mark that as
16 Exhibit A, if we can, to this deposition.

17 (Deposition Exhibit A marked.)

18 Q. (BY MR. PHILLIPS) I'm going to hand you a
19 document that says "Sea West."

20 A. Correct.

21 Q. Can you tell me what that is?

22 A. That's a \$12,000 transfer -- copy of a
23 transfer receipt from Sea West to Indico System
24 Resource -- Resources, Bank of America.

25 Q. Is it a wire transfer?

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1 A. I think this is a document -- actually, it
2 didn't go to Bank of America because the wire transfer
3 was going to take too long, so I think ultimately it was
4 transferred to my account at Chase. I don't recall.
5 It's been a while. And then -- to tell you the truth, I
6 can't remember how it was handled, but he -- he did get
7 the money.

8 Q. Okay. And what is the date of that -- of that
9 purported transfer?

10 A. February 25, 2015.

11 Q. So that would have been three or four months
12 ago?

13 A. Right.

14 Q. Okay.

15 MR. PHILLIPS: Let's mark that as
16 Exhibit B, if we can.

17 (Deposition Exhibit B marked.)

18 Q. (BY MR. PHILLIPS) You also provided this
19 document which has the words "Chase" across the top?

20 A. Right.

21 Q. What is this?

22 A. These are two receipts for funds that were
23 provided to Dr. Watts for expenses related to the gold
24 investment.

25 Q. Okay. And were those -- are those withdrawal

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1 A. These are transfers from the Wells Fargo
2 account to Dr. Watts or Indico Systems.

3 Q. They're transfers?

4 A. They're not transfers. Again, we -- we did it
5 in cash. So I went to the bank and took that money out
6 and handed it to Dr. Watts.

7 Q. And so each one of those receipts reflects
8 money that you took out of your accounts that you gave
9 to him?

10 A. Correct.

11 Q. And that's on top of the 250 that was wired to
12 him in 2014?

13 A. Correct.

14 Q. Did this come out of your personal account or
15 Byrd's Eye?

16 A. This is the Byrd's Eye. All -- all of it, to
17 my recollection, has been from Byrd's Eye. The \$12,000
18 was not, because that came out of my personal account at
19 Sea West.

20 Q. Okay.

21 A. I think that's the only amount.

22 MR. PHILLIPS: I'm going to mark this as
23 Exhibit D.

24 (Deposition Exhibit D marked.)

25 Q. (BY MR. PHILLIPS) You've also provided some

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1 Q. (BY MR. PHILLIPS) Okay. Mr. Byrd, thank you
2 for your patience. I'm going to try to wrap this up. I
3 have a couple of follow-up questions based on some of
4 the things we talked about earlier.

5 Before I ask you that, when was the last
6 time you spoke with Beverly Parfitt?

7 A. 2007 or '8.

8 Q. Okay. So she -- she hasn't mentioned to you
9 that I've spoken with her?

10 A. No.

11 Q. Did you -- have you inherited any money?

12 A. No.

13 Q. Can you tell me a little bit more about the
14 Nevada investment. You said the company was called
15 Front --

16 A. Front Sight.

17 Q. Front Sight?

18 A. Yes.

19 Q. How did you find out about that?

20 A. I was -- Beverly and I were in Las Vegas on
21 a -- I guess you'd say a vacation, and I was looking for
22 something to do, saw that in one of their magazines and
23 went out and took a two-day course.

24 Q. What kind of an investment was it?

25 A. Development investment would be the way I'd

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1 characterize it, you know, help build -- multiple
2 investors, help grow the resort.

3 Q. So it was a resort?

4 A. Yeah. At the time, it was just -- I'm not
5 sure what his plans were at the time, but yeah.

6 Q. When was this?

7 A. '97, maybe.

8 Q. And you and Beverly Parfitt were still
9 married?

10 A. Correct.

11 Q. How much did you invest in Front Sight?

12 A. I didn't invest then. I just took a course.
13 I didn't invest in Front Sight until -- I don't
14 remember -- maybe sometime between '97 and 2000.

15 Q. Okay. And how much did you invest?

16 A. I don't -- it was a very -- maybe \$3,000. I
17 don't -- I don't recall.

18 Q. Okay. Do you remember -- do you remember what
19 the return on your investment was, what you -- what you
20 left with?

21 A. \$250,000.

22 Q. So you invested \$3,000 and walked away with
23 \$250,000?

24 A. I reinvested over -- over the years different
25 amounts.

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1 of -- when you took it out of Front Sight, where did you
2 put it, in the Byrd's Eye account?

3 A. Right. That was Byrd's Eye's money in the
4 first place. That's money that I put in for my personal
5 income into Byrd's Eye, and I used it for that purpose,
6 to invest in Front Sight.

7 Q. Do you routinely file tax returns for Byrd's
8 Eye?

9 A. Yes.

10 Q. And on your tax return, did you report that
11 profit as income?

12 A. That was in -- that was a loan, so my CPA
13 advised me that that was a loan -- a return of principal
14 and interest. Anyway, that it was not necessary to
15 report that.

16 Q. Okay. Do you -- do you happen to know, if I
17 go on the internet, will I be able to find anything out
18 about Front Sight --

19 A. Yes.

20 Q. Is it a fairly well-known --

21 A. It should be easy to --

22 Q. Okay. You mentioned that you had a
23 self-directed 401(k) with Wells Fargo. Did you use any
24 of that money with -- with Watts?

25 A. Yes. The -- the receipts in there, those

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1 someone who has had any success in business would live
2 in?

3 A. No.

4 Q. Okay. Why, then, would you feel comfortable
5 investing so much money with him?

6 A. Well, just because I know him.

7 Q. Okay. How -- how would you -- what portion of
8 your net worth would you say that \$250,000 represents?

9 A. Half.

10 Q. So you've got another quarter of a million
11 or --

12 A. No. It's more than half. It's probably -- I
13 mean, I'm just guessing. It's probably three-quarters.

14 Q. So, I mean, it's kind of your life savings?

15 A. Pretty much. It was -- yeah.

16 Q. So you -- you told me you didn't do any due
17 diligence; you didn't talk to anybody else. He lives in
18 a house that probably is not one you would expect to be
19 occupied by someone who is in the business of making a
20 lot of money on gold investments, and you gave him what
21 you would characterize as a large part of your life
22 savings.

23 A. Right.

24 Q. I'm trying to understand why you would do
25 that, and the only answer you've given me is because

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1 your plans with respect to getting your money back?

2 A. Well, when the shipment comes in, I'll get my
3 money back.

4 Q. All right. And when will -- how long are you
5 willing to wait?

6 A. Until I am convinced for some reason that it's
7 not going to happen.

8 Q. And what's it going to take?

9 A. Me coming to the conclusion that, you know, I
10 was wrong about Cleal Watts.

11 Q. And you haven't reached that conclusion yet?

12 A. No.

13 Q. Okay. So you still believe that you will
14 recognize some kind of return on your investment?

15 A. Yes. I'm 99.9 percent confident.

16 Q. And that's strictly based on your history with
17 him?

18 A. Right.

19 Q. Nothing else?

20 A. Uh-huh. Him and his family. I met his dad
21 and his mom and his whole family and they're a little,
22 you know, off the beaten path, but I trust them. I know
23 their reputation.

24 Q. Have you discussed your investment with any of
25 them?

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1 know, encouragement that, you know, this does happen.

2 Q. Okay. Before we wrap up --

3 MR. PHILLIPS: Do I have time to ask one
4 more question on this tape?

5 THE WITNESS: Two minutes.

6 Q. (BY MR. PHILLIPS) Okay. Before we wrap up,
7 other than your faith in him as a friend, is there any
8 other reason you can give me for why you believe that
9 you trust this man with your -- with your life savings?
10 Has he said anything to you, have you seen anything, do
11 you have any knowledge or any reason to believe other
12 than your faith in him as a friend and your knowledge of
13 him over time?

14 A. Other than our background, no. I mean, I know
15 where he lived when we met, when I met his family, and
16 so the -- I just know the kind of person that he is. I
17 trust him.

18 MR. PHILLIPS: Okay. We're good. Thank
19 you.

20 THE WITNESS: Okay.

21 THE VIDEOGRAPHER: The time is now
22 10:50 a.m. We are now off record.

23 (Deposition concluded at 10:50 a.m.)
24
25

